

**EPSTEIN BECKER & GREEN, P.C.**

Kenneth J. Kelly (KK 4195)  
Lori A. Jordan (LJ 0853)  
250 Park Avenue  
New York, New York 10177-0077  
(212) 351-4500  
Attorneys for Defendants

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KATHLEEN G. CULLY,

Plaintiff,

- against -

CIFG HOLDING, CIFG GUARANTY, CIFG  
EUROPE, CIFG SERVICES, INC., CIFG  
ASSURANCE NORTH AMERICA, INC., and  
JACQUES ROLFO,

Defendants.  
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07 CIV. 8195 (PKC)

**NOTICE OF MOTION**

**Oral Argument Requested**

**PLEASE TAKE NOTICE** that, upon the accompanying Declaration of Pamela Brown, dated December 7, 2007, and the exhibits annexed thereto, defendants CIFG Holding and CIFG Services, Inc., by its attorneys, Epstein Becker & Green, P.C. will move this Court before the Honorable P. Kevin Castel, at the United States Courthouse, 500 Pearl Street, New York, New York, on a date to be determined by the Court, pursuant to Rule 12(b)(3) of the Federal Rules of Civil Procedure and sections 2, 3 and 4 of the Federal Arbitration Act, 9 U.S.C. §§ 1 et seq. for an order: (1) dismissing all claims asserted in the complaint against CIFG Holding relating to long-term incentive awards pursuant to plans established by CIFG Holding; (2) directing arbitration of claims asserted in the complaint against CIFG Services, Inc. relating

to long-term incentive awards pursuant to plans established by CIFG Services, Inc.; and (3) granting such other and further relief as the Court deems just and proper.

Dated: New York, New York  
December 7, 2007

EPSTEIN BECKER & GREEN, P.C.

By: 

Kenneth J. Kelly (KK-4195)

Lori A. Jordan (LJ-0853)

250 Park Avenue

New York, New York 10177

(212) 351-4500

Attorneys for Defendants

To: Anne L. Clarke, Esq.  
Vladeck, Waldman, Elias  
& Engelhard, P.C.  
1501 Broadway, Suite 800  
New York, New York 10036-5560  
(212) 403-7300  
Attorneys for Plaintiff